

Flores, Priscilla (Feliciano)

From: Davidj Gray <gray.davidj@epamail.epa.gov>
Sent: Tuesday, August 19, 2014 2:31 PM
To: Gray, Davidj
Subject: Fw: International Salt - Portsmouth, NH and Boston, MA NPDES Review and Management Practices
Attachments: 103653 R01 EP-BMPs.pdf

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----- Forwarded by Davidj Gray/R1/USEPA/US on 08/19/2014 02:31 PM -----

From: "Paul Simonetta" <psimonetta@tritonenvironmental.com>  
To: Davidj Gray/R1/USEPA/US@EPA  
Date: 08/18/2010 03:33 PM  
Subject: International Salt - Portsmouth, NH and Boston, MA NPDES Review and Management Practices

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David - We appreciate your assistance in completing a NPDES stormwater review for the above referenced ISCO sites. We understand that you agree with our assessment that NPDES permits are not currently required for the referenced sites and are planning to prepare a letter response indicating as such. To assist you in preparing a response, you had requested some additional information regarding standard operating procedures and management practices for the sites. I have provided a summary of the BMPs that are applied at each of ISCO's sites (see below.) Also, I have attached an example of a representative plan/procedures for one of ISCO's other locations. We have been asked by ISCO to develop similar manuals for other sites and will be preparing comparable plans for the two referenced sites.

If you have any further questions, please contact me.

Sincerely,

Paul Simonetta

1. Stockpile Covers/Salt Storage - Following receipt of salt, the product is graded into a stockpile and a stage cover is placed on the pile. Once the stockpile is full, it is completely covered until such time as outbound shipments occur.

2. Good Housekeeping - Good housekeeping BMP's are used to maintain a clean and orderly work place in order to minimize any impacts to stormwater quality. Facility personnel are responsible for clean-up of product spilled during loading or transporting and keeping surfaces in a generally clean condition.

3. Sediment and Dust Control - Salt received at the site typically has 0.3-0.5% moisture content, minimizing the concern for air-borne mobilization of salt (dust).

4. Preventative Maintenance - Equipment and vehicles are regularly inspected for signs of wear or deterioration. If wear is identified, the items are repaired or replaced.

5. Inspections - ISCO personnel conduct informal inspections as part of normal facility operations.

Ref No. 103702.08.18.10



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*(See attached file: 103653 R01 EP-BMPs.pdf)*